

Standard Operating Procedure

Management of Hazardous Materials/ Hazardous Waste

April 2003

1. Applicability

This standard operating procedure (SOP) (CDRL #s A006 and A007) provides management and field personnel guidance for the management of hazardous waste during field activities. This SOP covers a broad range of requirements and is intended to supplement the project specific Work Plan, sampling and Analysis Plan (SAP), and Health and Safety Plan (HSP).

Activities conducted in the field by Weston Solutions, Inc. (WESTON) and its subcontractors will be completed in compliance with appropriate federal, state, and local laws, codes, regulations, and guidance. As applicable, the requirements outlined in the following subsections will be satisfied for each project. Acronyms utilized within the text of this document are listed at the end of this SOP.

2. References

Emergency Response Guidebook, U.S. Department of Transportation (DOT)

Applicable regulations include:

40 CFR 260-370	Environmental Protection Agency-Hazardous Materials
40 CFR 761	Environmental Protection Agency-Toxic Substances
49 CFR 106-178	DOT-Hazardous Materials Transportation
29 CFR 1910	Occupational Safety and Health Administration
30 TAC 335	Texas Commission on Environmental Quality (TCEQ)

3. Responsibilities

Project Manager The Project Manager has overall responsibility for the project. The Project Manager must approve all changes and deviations from the project plans.

Site Manager The Site Manager is responsible for field functions. These functions include compliance to project plans and directing field activities. The Site Manager is responsible for communicating status and changes or deviations to the Project Manager.

Waste Subcontractor The waste subcontractor is responsible for performing the tasks assigned by the Site Manager and the Work Plan. The waste subcontractor will perform the duties in the field outlined in this document. An authorized employee of the subcontractor will be assigned as the point of contact for the submittals and communications between the subcontractor and Weston, or the Client.

4. Procedure

4.1 General

Safe work practices will be followed by all workers when handling hazardous waste. This includes wearing proper personal protective equipment (PPE) as described in the project specific HSP.

Emergency response equipment will be kept on-site whenever working with or near hazardous waste. Equipment will include, at a minimum, fire extinguishers, absorbents, drum over packs, spill control equipment (ex. spark proof shovels), communications and alarm systems, an emergency response guidebook, and decontamination equipment.

Wastes that are subject to special regulations, such as used oil (40 Code of Federal Regulations [CFR] 279) and universal wastes (fluorescent light tubes, batteries etc.) (40 CFR 273), will be managed according to the appropriate regulations.

A Hazardous Waste (HW) Log will be maintained, and updated daily, at each site to track the hazardous waste generated.

4.2 Waste Training

Only qualified workers, who have completed the 40-hour HAZWOPER training and annual 8 hour refresher courses, may work with or in areas where hazardous waste is or may be present. Certificates of completion, for all workers who may work with hazardous waste, will be kept on site.

All workers who are responsible for managing hazardous waste shall receive training from the Site Safety Officer on the contents of this plan (particularly the contingency plan) before working without supervision within any hazardous waste storage area.

4.3 Packaging and Labeling

All wastes known or suspected of being hazardous will be packaged and labeled according to 49 CFR 172-178 prior to being transported to the on-site temporary storage area. Only containers that meet the DOT performance oriented standards (United Nations markings) will be used to contain hazardous wastes. All containers shall be in good condition and free of leaks. All containers shall be chemically compatible with the waste stored within. Liquid wastes shall be stored in a bung-top drum and solid wastes shall be stored in an open-top drum.

Every hazardous waste container shall have a hazardous waste label placed on the container as soon as any waste material has been placed in the container. At a minimum, the hazardous waste label will include the following:

1. HW - Federal law prohibits improper disposal. If found, contact the nearest police/public safety authority or the Environmental Protection Agency (EPA).
2. Generator's Name and Address _____.
3. Manifest Document Number _____.
4. EPA Waste Codes _____.
5. Proper Shipping Name _____.
6. Accumulation Start Date _____.

Wastes in drums for which a sample has been collected, but no results have been received, shall be marked with the word "Sampled" and the sampling date. If the waste is a regulated PCB waste, a PCB label will be placed on the container, as well as a marine pollutant label, if necessary. All non-hazardous waste containers shall have a "Non-Regulated Waste" label placed on the container.

4.4 Temporary Waste Accumulation area

In areas where waste will be stored temporarily, an on-site waste accumulation area will be constructed, in a predetermined area, to contain hazardous wastes until they are shipped off-site for disposal. Construction of the accumulation area will comply with 40 CFR 264.175-179. The area will be lined with a double layer of 10 millimeter impermeable sheeting with a 12-inch high earthen dike to serve as containment. Sand will be placed on top of the sheeting to protect the fabric.

Drums of waste will be palletized, four to a pallet, labels facing out, and staged in rows inside the diked area. There will be no less than three feet of space between pallets. Containers holding hazardous waste will be kept closed during storage. A container holding hazardous waste will not be opened, handled, or stored in a manner that may rupture a container or cause it to leak. No containers of incompatible wastes shall be stored next to each other. Table 176.83(b) of 49 CFR 176.83 will be used to determine which wastes are required to be segregated from each other.

The hazardous waste storage area shall be posted with a "HAZARDOUS WASTE" sign, as well as hazard class placards for each hazard class present.

There shall be no smoking permitted within 100 feet of hazardous waste storage areas. Emergency response equipment, as well as first aid and emergency eye wash equipment, will be kept at the temporary storage area. The hazardous waste storage area will be maintained in a clean and organized manner.

The storage area and containers will be inspected daily, and one day every week an inspection form will be completed. An inventory will be maintained, in addition to the HW and PCB Log, of all the waste stored in the accumulation area.

4.5 Waste Characterization

Containers that are required to be sampled must be sampled within thirty days of the container's becoming full. Every sample must be collected in a manner so that it is representative of the waste material in the container.

- (1) For liquids, the container should be mixed before sampling and the sample collected using a tube that is long enough to reach the bottom of the container.
- (2) For solids, the sample should be representative of the waste matrix in the container.

Refer to the project SAP for specific details, such as frequency and analyses to be performed. Samples must be collected using clean sampling equipment and transferred into containers provided by the laboratory.

Generator process knowledge and analytical laboratory results will determine whether a waste shall be characterized as a hazardous waste. A general guidance for hazardous waste determinations has been provided as Attachment 1. A table of the most common waste codes has been provided as Table 1 and 2 below.

4.6 Transportation and Disposal

The necessary deliverables that contain the transportation and disposal criteria, procedures, and practices sufficient to protect personnel, the environment, and potential off-site receptors from chemical, physical, and/or biological hazards must be prepared for each project. If information provided by the Client is not sufficient to develop the deliverables, the Client should be provided with a description of additional information required.

Transportation, storage, treatment, and/or disposal of hazardous materials will comply with federal, state, and local laws and regulations. The waste stream will be characterized to determine the most cost-effective treatment, storage, and disposal facility (TSDF) that is in compliance with federal, state, and local laws and regulations. Any additional analyses necessary to ensure compliance with treatment, storage, and disposal requirements should be identified, and the analyses should be conducted.

Selection of a TSDF must be based on cost-effectiveness, compliance status, regulatory agency input (as appropriate), and Client approval. If waste is to be sent for off-site storage or disposal, the following information should be submitted to the Client:

- Transporter — Name, location, point of contact, EPA identification number, verification that the transporter is a licensed Hazardous Waste Transporter in accordance with DOT regulations, and Notice of Violation (NOV) status.
- Disposal Facility — Attempts should be made to obtain a minimum of three quotes for the treatment, storage, or disposal of each wastestream (it may not be possible to obtain three quotes due to the nature of the waste, schedule for disposal, proximity to the facility, etc.). For each quote, the facility name; location; point of contact; telephone

number; unit cost; and total cost for treatment, storage, or disposal, transportation, taxes, and disposal fees should be provided. Based on this information, the name, location, point of contact, EPA identification number, and NOV status should be provided for the selected facility.

- A list of all TSDFs contacted should be provided, even if a quote was not received. The list should include the facility name, location, point of contact, cost data, telephone number, and reason that the quote was not received.
- Analytical and Manifest Package — The "Complete Manifest Package" should consist of hazardous waste manifests, PCB manifests, hazardous material shipping papers, waste profile sheets, the land disposal restriction (LDR) notification and certification forms, and all other supporting documentation (including waste disposal history, analytical results, Material Safety Data Sheets [MSDSs], other information received in identifying the proper waste code, the specific type of inner and outer packaging, markings, labeling, and placards offered to the transporter).
- Shipment Tracking — Notification should be made to the Client if shipments to the TSDF are within the required timeframes. Required reports should be provided if receipt has been delayed (i.e., discrepancy reports or exception reports).
- Tracking of Hazardous and/or Solid Wastes — Written acceptance from the TSDF received by WESTON prior to mobilization for transportation and disposal should be provided to the Client. The mechanism used to track hazardous and solid waste transportation and disposal activities should be included in the Contractor QA and Quality Control (QC) Plan.
- Certification — Generator-supplied site documentation should be reviewed. The logic and/or telecopy relied upon in making the determination should be included as part of the manifest package. If records on waste history are unavailable, the generator or any available past site workers present when the waste was disposed of should be interviewed to ascertain the origin of the waste. If requested by the Client, a letter to the TSDF should be drafted, for generator signature, certifying that the information listed is based on available historical data.

Table 1. EPA HW Codes - D-Listed (Characteristic) Wastes

EPA HW Regulatory #	Contaminant	Maximum Allowable Level (mg/l)	EPA HW Regulatory #	Contaminant	Maximum Allowable Level (mg/l)
D001	Ignitability	A	D031	Heptachlor(and its epoxide)	0.008
D002	Corrosivity	B	D032	Hexachlorobenzene	0.13*
D003	Reactivity	C	D033	Hexachlorobutadiene	0.5
D004	Arsenic	5.0	D034	Hexachloroethane	3.0
D005	Barium	100.0	D008	Lead	5.0
D018	Benzene	0.5	D013	Lindane	0.4
D006	Cadmium	1.0	D009	Mercury	0.2
D019	Carbon Tetrachloride	0.5	D014	Methoxychlor	10.0
D020	Chlordane	0.03	D035	Methyl Ethyl Ketone	200.0
D021	Chlorobenzene	100.0	D036	Nitrobenzene	2.0
D022	Chloroform	6.0	D037	Pentachlorophenol	100.0
D007	Chromium	5.0	D038	Pyridine	5.0*
D023	o-Cresol	200.0**	D010	Selenium	1.0
D024	m-Cresol	200.0**	D011	Silver	5.0
D025	p-Cresol	200.0**	D039	Tetrachloroethylene	0.7
D026	Cresol	200.0**	D015	Toxaphene	0.5
D016	2,4-D	10.0	D040	Trichloroethylene	0.5
D027	1,4-Dichlorobenzene	7.5	D041	2,4,5-Trichlorophenol	400.0
D028	1,2-Dichloroethane	0.5	D042	2,4,6-Trichlorophenol	2.0
D029	1,1-Dichloroethylene	0.7	D017	2,4,5-TP (Silvex)	1.0
D030	2,4-Dinitrotoluene	0.13*	D043	Vinyl Chloride	0.2
D012	Endrin	0.02			

a - Defined in 40 CFR 261.24

b - Defined in 40 CFR 261.22

c - Defined in 40 CFR 261.23

* - Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.

** - If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200mg/l.

Table 2. EPA HW Codes - Common F-Listed Wastes

Industry and EPA Hazardous Waste No.	EPA Hazardous Wastes from Non-Specific Sources	Hazard Code Ignitable/Toxic
Generic: F001	The following spent halogenated solvents used in degreasing tetrachloroethylene, trichloroethylene, methylene chloride. 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvents mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and IO05; and still-bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, I, I, I -trichloroethane, chlorobenzene, I, I ,2-trichloro- 1,2,2 trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvents mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvents mixtures/blends containing, before use, only the above spent on-halogenated solvents; and all spent solvents mixtures/blends containing, before use, one or more of the above listed non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(I)
F004	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; all spent solvents mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(T)
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine. benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvents mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.	(I,T)

4.6.1 Complete Manifest Package

WESTON/Client Review

The QC Manager will be responsible to review the Complete Manifest Package and shipping documentation. The QC Manager will certify as correct the Hazardous Waste Manifest, Waste Profile Sheets, and LDR Notification and Certification forms and supporting documentation. Once the review is completed, a reproducible copy of the documents will be submitted to the Client for approval. It is preferred that the Client signs the waste profile sheets. If the project requires WESTON signature, the following procedures will be used.

For those projects in which WESTON is involved in the waste characterization (i.e., reviewing past operations to determine likely contaminants, collecting samples, reviewing analytical results, and preparing data summaries), WESTON will complete and sign the waste profile sheets. The waste profile sheets will be accompanied by the following certification, signed by the QC Manager:

"As an agent for the Client, I certify that in preparing the attached waste profile sheets, appropriate efforts were made to properly identify the listed wastestreams (e.g., reviewing generator-supplied site documentation or, if such documentation is unavailable, interviewing the generator or any past site workers present when the waste was disposed to ascertain the origin of the waste, ensuring appropriate contaminants were selected for analysis, reviewing analytical results, etc.). If a transporter is being used for transport of the subject wastes, I certify that the packaging, marking, labeling, handling, and placarding of waste complies with federal, state, and local laws and regulations and that it correlates with the waste classification and quantities designated on the manifest prior to signature of the transporter."

If WESTON has not been involved or is not knowledgeable regarding waste characterization, WESTON will review available information and complete the waste profile sheets, based on existing data. The Client will be responsible for signing these waste profile sheets. The waste profile sheets should be accompanied by the following certification, signed by the QC Manager:

"As an agent for the Client, I certify that in preparing the attached waste profile sheets, appropriate efforts were made to properly identify the listed wastestreams (i.e., reviewing generator-supplied site documentation or, if such documentation is unavailable, interviewing the generator or any past site workers present when the waste was disposed to ascertain the origin of the waste, etc.). If a transporter is being used for transport of the subject wastes, I certify that the packaging, marking, labeling, handling, and placarding of waste complies with federal, state, and local laws and regulations and that it correlates with the waste classification and quantities designated on the manifest prior to signature of the transporter."

In either case, a summary of the logic used to complete the waste profile sheets should be completed and attached to the complete manifest package.

One manifest package will be submitted for each wastestream. WESTON should hold the original package and make corrections based on Client approval prior to submission to the generator's representative for signature. The submittal of the Complete Manifest Package will be attached to a Transmittal Form (see WESTON Transmittal Form QS-09-F-010-01), or its equivalent.

No wastes should be transported or shipped prior to Client approval of the Complete Manifest Package. WESTON should request that: 1) the Client try to conduct the approval process within 5 working days after receipt; 2) if a delay in approval is anticipated, the Client notify WESTON as soon as possible; and 3) after the review process is completed, the Client telecopy the completed manifest to WESTON.

Designation of Generator

The generator and signer of the Hazardous Waste Manifests, Waste Profile Sheets, and LDR Notifications and Certifications should be identified by the Client, where appropriate. A fully executed and Complete Manifest Package, including final disposition information, covering all solid and hazardous waste disposal should be submitted as an appendix to the Final Report covering the field activities, as well as the above information and quantities shipped.

Transport Considerations

For projects involving off-site transportation, on-site personnel overseeing the transporter prior to shipment of the hazardous waste will certify that the packaging, marking, labeling, handling, and placarding of waste comply with federal, state, and local laws and regulations and that they correlate with the waste classification and quantities designated on the manifest prior to the signature of the transporter. The certification should be submitted to the Client prior to transport and included as part of the Final Report. On-site personnel responsible for certification should be trained as per DOT regulations.

Generator Status

The generator's status at the site for work generated under projects should be determined based on federal, state, and local laws and regulations. Generator status may include conditionally exempted small quantity generator, small quantity generator, and generator.

4.6.2 Transportation and Disposal Reporting Requirements

The following reporting requirements pertain to the transportation and disposal of wastes for fieldwork:

- **Hazardous Waste Manifest Annual and/or Biennial Reporting** — Information necessary to file the Annual and/or Biennial reports should be prepared for submission to the Client for each project to meet federal or state laws and regulations as part of the Final Report. These report sections should contain the information necessary for the finalization of the formal report in the form and format required by the governing federal or state regulatory agency. A cover letter should accompany the report to include the contract number; WESTON's name as Contractor; Client; Contract number, and project name; location of project; report type; and date of submittal.

- Tabulated Waste Handling Information — The state reporting requirements (i.e., generator state and/or disposal state) should be determined and current state reporting forms obtained. A completed draft of required forms, with applicable attachments, should be submitted to the Client for approval prior to submission to the federal or state regulator. The state reporting forms should also be included within the Final Report.
- Transportation and Disposal Tracking Form — The Transportation and Disposal Tracking Form should be completed and provided with each project. This form allows the tracking of key transportation and disposal milestones throughout the performance of the project. The form lists all waste materials going off-site. When tracking the waste, the date that the transporter accepts the waste will be identified by their signature on the manifest.
- Discrepancy Reports — Discrepancies due to differences between the quantities or types of hazardous waste designated on the manifest or shipping papers, and the quantity or type of hazardous waste a facility actually receives, should be reported to the Client and rectified by WESTON within 15 days after receiving the waste. This information should be presented in a Final Report, as applicable.
- Exception Reports — Verification should be made to determine if the generator or generator representative has received a copy of the signed manifest from the TSDF on or before the 35th day after transporter signature. If the generator or generator's representative has failed to receive a signed copy of the manifest by the 44th day, a draft EPA exception report should be prepared for Client approval. The final exception report should be submitted to the Client no later than day 45. This information should also be presented in a Final Report, as applicable. Prior to official submittal of an exception report, a draft copy of the report should be submitted to the Client for review. WESTON should request that the Client make every effort to conduct the approval process within 5 working days after receipt.
- Toxic Substances Control Act (TSCA) PCB Reporting Requirements — If specified in the project, or in the event of discovery of equipment or containers, or any media, including soil or water, with PCB-contaminated fluid impacted by the work in the project, the following activities should be completed:
 - Notify the Client immediately and report the findings in writing as soon as possible.
 - Complete and submit all necessary logs and reports in accordance with federal and state laws and regulations.
 - Satisfy all manifest and reporting requirements stated herein, as well as otherwise applicable to the PCB-containing material.

- Arrange for proper disposal of the waste; and when disposal is completed, certify that the PCB-contaminated material was disposed of properly in accordance with federal, state, and local laws and regulations.
- Report information concerning the incident, and include copies of related documents in a Final Report, as applicable.

4.6.3 On-Site Personnel

A trained, experienced on-site person should be used to ensure that on-site procedures for the transportation and disposal of hazardous wastes are implemented and enforced on-site. This person should ensure that, prior to shipment, hazardous waste packaging, marking, labeling, handling, and placarding comply with federal, state, and local laws and regulations and correlate with the waste classification and quantities designated on the manifest prior to the signature of the transporter. The on-site person responsible for certification should be trained as per DOT regulations.

4.6.4 Notices of Noncompliance

In the event that WESTON is notified by a federal, state, or local agent that a manifest, shipment, waste disposal, or related activity is not in order or not in compliance with any requirement, the Client should be notified immediately. Copies of notices and relevant documents should be furnished to the Client, including correspondence, subcontracts, laboratory reports, memoranda, etc., along with any other documents requested by the Client. WESTON should coordinate its response to the notice with the Client prior to submission to the notifying authority. A copy of documents submitted to the authority, including the final reply to the notice, should be provided to the Client.

4.7 Spill and Emergency Response

If a spill should occur, the site manager will assume control and direct personnel on site in spill control, containment and recovery. If the accident is beyond the immediate capabilities of on-site personnel, or exceeds the volume requiring notification of local agencies, the site manager will contact appropriate agencies. The initial response will be to protect human health and safety and the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

Spill or Leaks

For spills or leaks, follow the following guidelines

- If a leak develops or a spill occurs from a tank, pipeline pump, etc., the person discovering the discharge will close the appropriate valve and shut-off any affected pumps, if possible, and then leave the immediate area and contact the site manager.
- Obtain first aid for any injured person(s) and call the hospital if necessary.

- Call the fire department if a fire is involved, even if the fire can be extinguished by the emergency response team. Fight small fires with dry chemicals, or carbon dioxide, and large fires with water spray, or fog. Keep heat exposed containers cooled with water spray and remove them from the fire if possible.
- If fuel pipelines or tanks become involved, immediately evacuate personnel from the area and inform the fire department.
- Initiate evacuation of the hazard area, if necessary. For small spills or leaks, isolate an area approximately 50 feet in all directions. For large spills, initially isolate an area approximately 100 feet in all directions and keep all persons upwind of the spill.
- Dispatch emergency response team to the site to take appropriate action.
- Report the spill in accordance with spill notification requirements. Resource Conservation and Recovery Act regulations require hazardous waste generators and TSDFs to report releases, fires, or explosions involving hazardous waste that could threaten human health or the environment outside the installation to state and local emergency response organizations and the National Response Center.

Emergency Response Team Actions

- Make sure all unnecessary persons are removed from the hazard site.
- Put on protective clothing and equipment.
- If an ignitable material is involved, remove all ignition sources, and use spark and explosion-proof equipment in containment and cleanup.
- If possible, try to stop the leak. Several options are available:
 1. Draw tank or container down below the leak point by siphoning off into a vacuum truck.
 2. Use a plugging compound.
 3. Use an over pack drum if a container is leaking.
- Determine the major components in the waste at the time of the spill.
- Use absorbents to contain, divert, and clean up a spill if it has not been contained by a dike or sump. Outlet spills contained within a dike or sump will be pumped back into the appropriate storage tank, if possible.
- Place containment and cleanup materials in drums for proper disposal as outlined in this document.

4.8 Contingency Plan

An Emergency Plan will be prepared for each field site where work is to be performed. The project Manager shall assess the Emergency Plan after any major change in the scope to the project. The following elements shall be included in the site emergency plan:

1. Identification of an emergency coordinator.
2. Specification of emergency procedures for managing incidents Identification of an Emergency Coordinator.
3. Specification of Emergency Procedures for managing incidents involving hazardous waste.
4. Specification of procedures for making an assessment of the need for local evacuation.
5. Specification of procedures for following notifications:
 - a) Local Police.
 - b) Local fire department (if fire or need additional assistance).
 - c) Client Emergency Number.
 - d) National Response Center (if release of a reportable quantity of a hazardous waste).
6. Specification of procedures for treatment and storage of waste generated during the emergency.
7. Specification of procedures for a restoration of emergency equipment.
8. Specification of procedures for making an assessment that the facility can be returned to operational status.
9. Specification of procedures for notifying the client that the facility is able to return to operation.
10. Specification of procedures for reporting the following to the client within 15 days after the incident:
 - a) Name, address and telephone number of client and the Contractor.
 - b) Date, time and type of incident.
 - c) Name and quantity of material involved in the incident.
 - d) Extent of injuries, if any.
 - e) Assessment of the actual and potential hazards to human health or the environment, where applicable.
 - f) Estimated quantity and disposition of material recovered during the incident.

LIST OF ACRONYMS AND ABBREVIATIONS

CFR	Code of Federal Regulation
DOT	Department of Transportation
EPA	Environmental Protection Agency
HSP	Health and Safety Plan
HW	Hazardous Waste
LDR	Land Disposal Restriction
mg/l	milligrams per liter
MSDS	Material Safety Data Sheet
NOV	Notice of Violation
PCBs	Polychlorobiphenyls
PPE	Personal Protective Equipment
QC	Quality Control
SAP	Sampling and Analysis Plan
SOP	Standard Operating Procedure
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and Disposal Facility
WESTON	Weston Solutions, Inc.

STANDARD OPERATING PROCEDURE
MANAGEMENT OF HAZARDOUS MATERIALS/ HAZARDOUS WASTE

ATTACHMENT 1

HAZARDOUS WASTE DETERMINATIONS
